

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

ALON ALEXANDER, OREN
ALEXANDER, and TAL ALEXANDER,

Defendants.

Case No.: 25-CV-2113

**DEFENDANT ALON ALEXANDER'S
NOTICE OF MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P. 12(b)**

Oral Argument Requested

AFFIRMATION OF JASON GOLDMAN

Pursuant to 28 U.S.C. § 1746(a), JASON GOLDMAN declares as follows:

1. I am the principal attorney with The Law Offices of Jason Goldman, counsel to Defendant Alon Alexander in this action. I make this affirmation, based upon my personal knowledge, in support of Defendant Alon Alexander's Motion to Dismiss Pursuant to Fed. R. Civ. P. 12(b).

2. Because the allegations in the Complaint against both Defendant Tal Alexander and Defendant Alon Alexander are identical, the reasons set forth by Tal Alexander for dismissal of the Complaint (*see* ECF Dkt. Nos. 12–14, 21) apply equally to Alon Alexander.¹

3. Accordingly, rather than repeating those arguments, Alon Alexander incorporates by reference the grounds for dismissal set forth in the Memorandum of Law (and Reply) of Tal Alexander (*id.*) as if fully set forth herein and incorporates by reference any and all additional filings in support of dismissal.

¹ This does not apply, however, to Defendant Tal Alexander's independent argument pertaining to Plaintiff's failure to state a claim against Defendant Tal Alexander. *See* ECF Dkt. No. 13, at Sec. II.C.

4. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 27, 2025

/s/ Jason Goldman
Jason Goldman, Esq.